



A Subsidiary of
Union Pacific Corporation

17 January 1992

Mr. Mark Matthews
RCRA Branch
Region VII
U. S. Environmental Protection Agency
726 Minnesota Avenue
Kansas City, Kansas 66101

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PRMT SECTION

Dear Mr. Matthews:

As we discussed 10 January 1992 in Wichita, I am interested in getting clarifications from you on the reasons certain units at the Hydrocarbon Recyclers, Inc. of Wichita (HRIW) facility were deemed to be miscellaneous (40 CFR 264 Subpart X) units. HRIW was required by the U. S. Environmental Protection Agency (USEPA), as represented by you, and by the Kansas Department of Health and Environment (KDHE) to include in its approved RCRA Part A application of 10 December 1991 a list of units USEPA and KDHE agreed were miscellaneous units. HRIW requires this information for portions of its Part B application which concern these units. To better your understanding of these units, I will describe conceptually how each of them operate. HRIW's description of these units in the upcoming HRIW RCRA Part B application should be consistent with, if not identical to, the descriptions below.

Shredder Unit

The shredder is a low speed, high torque, motor driven machine which shreds material into strips. It operates by using two counterrotating shafts with teeth and spacers to draw material in and shred it as it passes through. It is typically used for size reduction of materials for easier storage and/or prior to further processing.

Granulator Unit

The granulator uses cutting action to perform size reduction. Material is fed through a top opening to a motor-driven rotor with knives, and the final particle size depends on the openings in a screen which is at the outlet at the bottom of the unit.



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Dryer Unit

This unit is a rotary vacuum dryer with an axial shaft which drives plows that rotate and maintain a close tolerance with the vessel wall. The vessel wall has coils through which a heating medium (currently steam) is conducted. A vacuum pump is used to reduce the pressure inside the dryer to improve removal of evaporative materials, leaving nonvolatile materials behind. Evaporated solvents that can be drawn off with this unit are collected in two vessels. Vapors condensed in the Dryer Unit's condenser are collected in an accumulation vessel and later processed for recycling. Vapors not condensed in the Dryer Unit's condenser are condensed and collected in V-18. The Dryer Unit can also be used as a mixing device.

Drum Scraper Unit

The Drum Scraper is a custom built machine used to improve the removal of solid, viscous, and/or sticky materials from 55 gallon drums. It positions a deheaded drum and inserts a metal scraping and boring assembly that closely fits inside the drum walls. Blades within the assembly rotate to mobilize the drummed material to improve its later removal in the Dispersing Unit.

Dispersing Unit

The Dispersing Unit hydraulically lifts and tilts the drum to allow the drum's contents to pour into the disperser tank. While the drum is tilted, a wand extends into the drum to further clean it by spraying solvent on the drum's inside walls and bottom. If the drum is not adequately cleaned during the first run through, it can be sent back to be dumped and sprayed with solvent again. Once about two or three drums have been dumped into the dispersing tank, blending stock is added and the dispersing tank mixer is turned on. More drums are then dumped, until about one foot of freeboard is left in the tank. The dispersed material is then transferred to another storage tank.

Drum Washing Unit

The Drum Washing Unit is commercially purchased equipment designed to meet the 40 CFR 261.7 specification for permissible residues of hazardous waste in empty containers. The drum is automatically manipulated so it is upside down and the opening is oriented so the

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inside of the drum can be sprayed and allowed to drain. Each drum passes through three stations, and at each station cleaning solvent is sprayed into the drum and allowed to drain. After the third wash, the drum is automatically turned right side up and exits the unit.

Thank you for your consideration of these units regarding their classification as miscellaneous units (Ref. 52 FR 46946, 10 December 1987). Please contact me if you have any questions or need more information.

Sincerely,

A handwritten signature in cursive script, appearing to read "D. Brett Morton".

D. Brett Morton
Director of Regulatory Affairs
Hydrocarbon Recyclers, Inc.

cc: Siew Kour, Kansas Department of Health and Environment